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1 **LEWIS**  
2 AND  
3 **ROCA**  
4 LLP  
5 **LAWYERS**

ARIZONA CORPORATION COMMISSION  
DOCKETED

6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

7 **MARC SPITZER**  
8 **Chairman**  
9 **JAMES M. IRVIN**  
10 **Commissioner**  
11 **WILLIAM A. MUNDELL**  
12 **Commissioner**  
13 **JEFF HATCH-MILLER**  
14 **Commissioner**  
15 **MIKE GLEASON**  
16 **Commissioner**

Arizona Corporation Commission

**DOCKETED**

JUL 25 2003

DOCKETED BY

*CA*

17 **IN THE MATTER OF U S WEST**  
18 **COMMUNICATIONS, INC.'S**  
19 **COMPLIANCE WITH § 271 OF THE**  
20 **TELECOMMUNICATIONS ACT OF**  
21 **1996**

**Docket No. T-00000A-97-0238**

22 **WORLDCOM'S COMMENTS ON STAFF'S REPORT**  
23 **ON JULY 30-31 SUPPLEMENTAL WORKSHOP**  
24 **(REPORT TWO)**

25 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits  
26 these Reply Comments.

WorldCom concurs in the concerns raised by Eschelon Telecom, Inc. ("Eschelon")  
in its initial comments addressing Staff's Report (Report Two) found in Eschelon's  
Section 2 entitled, "*Application of Rates: Current DS1 capable loop example*" and the

1 concerns raised in AT&T's Reply Comments under the argument entitled "*Conditioning*  
2 *charges*".

3 Specifically, WorldCom concurs in the concerns found in Eschelon's initial  
4 comments and in AT&T's reply comments regarding Qwest's new "CRUNEC" process.  
5 This CRUNEC process was noticed under change management procedures in a "mail out"  
6 dated July 11, 2003.<sup>1</sup> Apparently, Qwest has already implemented the CRUNEC process  
7 described in the mail out prior to the expiration of the CLEC comment period (July 26,  
8 2003 before 5:00 pm) and prior to the proposed effective date of August 25, 2003, stated  
9 in the CRUNEC mail out.<sup>2</sup>

12 Moreover, the CRUNEC process appears to contradict provisions in Qwest's  
13 Arizona Statement of Generally Available Terms and Conditions ("SGAT"), as well as  
14 Commission orders, as noted by both Eschelon and AT&T.

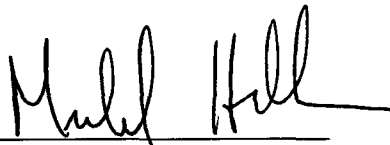
16 WorldCom requests that the Commission prevent Qwest from implementing its  
17 CRUNEC process and withhold any 271 approval that may be given by this Commission  
18 until the proposed CRUNEC process is eliminated or revised in a manner consistent with  
19 Qwest's Arizona SGAT and the Commission orders found in Decision No. 64922.

22  
23 <sup>1</sup> PROD.07.11.03.F.03468.UNECRUNEC\_V5.0

24 <sup>2</sup> As noted by Eschelon and AT&T, in a mailout to CLECs dated April 30, 2003, Qwest only proposed to modify "the existing  
25 manual process by removing conditioning as a limiting factor of the CRUNEC process as it relates to DS1 Capable Loops when  
26 facilities are not available". (PROS.04.30.03.F.01071. CRUNEC\_V4.0). No additional charges or processes were imposed on  
conditioning of unbundled loops in this release. The significance of the change in V4.0 was not readily apparent because no  
charges or processes were added. Covad filed a comment expressing concerns about the removal of conditioning and Qwest  
"declined this comment. See, [http://www.qwest.com/wholesale/downloads/2003/030521/CNL3\\_response](http://www.qwest.com/wholesale/downloads/2003/030521/CNL3_response)  
CRUNEC\_V4.doc.

1 RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of July, 2003.

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15 ORIGINAL and thirteen (13)  
16 copies of the foregoing filed  
17 this 25<sup>th</sup> day of July, 2003,  
with:

18 Arizona Corporation Commission  
19 Docket Control – Utilities Division  
1200 W. Washington Street  
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20  
21 COPY of the foregoing hand-  
22 delivered this 25<sup>th</sup> day of July, 2003,  
to:

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*Betty J. Griffin*